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**Terry v. County of Milwaukee; Deposition of Rusty Perry**

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**Douglas Knott** <dknott@lkglaw.net>

Mon, May 21, 2018 at 4:27 PM

To: Theresa Kleinhaus &lt;tess@loevy.com&gt;, "Russart, Michael P." &lt;mrussart@hinshawlaw.com&gt;

Cc: "Kugler, Mollie T." &lt;MKugler@hinshawlaw.com&gt;, Aisha Davis &lt;aisha@loevy.com&gt;, Scott Rauscher &lt;scott@loevy.com&gt;, Randy Arnold &lt;rarnold@lkglaw.net&gt;, Abraham Corrigan &lt;abraham@loevy.com&gt;

I can accommodate the week of the 4<sup>th</sup> other than Monday, June 4, and Wednesday, June 6—the latter because Margie Burton RN is scheduled in this case.

I would like to conduct the deposition of Ms. Terry either **Friday 5/1** or **Tues, June 5**. I have asked for suggestions as to where she is located and what is convenient for you. Shall I notice her for this office?

**Douglas S. Knott****Leib Knott Gaynor LLC****219 N. Milwaukee Street, Suite 710****Milwaukee, WI 53202****[www.lkglaw.net](http://www.lkglaw.net)****Direct: 414-276-2109****Cell: 414-416-9095****Fax: 414-276-2140**

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**Case 2:17-cv-01112-JPS Filed 06/20/18 Page 1 of 11 Document 132-3**

either by phone (414-276-2102) or reply to this e-mail and delete all copies.

**From:** Theresa Kleinhaus [mailto:[tess@loevy.com](mailto:tess@loevy.com)]

**Sent:** May 21, 2018 4:11 PM

**To:** Russart, Michael P. <[mrussart@hinshawlaw.com](mailto:mrussart@hinshawlaw.com)>

**Cc:** Douglas Knott <[dknott@lkglaw.net](mailto:dknott@lkglaw.net)>; Kugler, Mollie T. <[MKugler@hinshawlaw.com](mailto:MKugler@hinshawlaw.com)>; Aisha Davis <[aisha@loevy.com](mailto:aisha@loevy.com)>; Scott Rauscher <[scott@loevy.com](mailto:scott@loevy.com)>; Randy Arnold <[rarnold@lkglaw.net](mailto:rarnold@lkglaw.net)>; Abraham Corrigan <[abraham@loevy.com](mailto:abraham@loevy.com)>

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Theresa Kleinhaus &lt;tess@loevy.com&gt;

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## Terry v. County of Milwaukee

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Theresa Kleinhaus &lt;tess@loevy.com&gt;

Wed, May 23, 2018 at 5:01 PM

To: Douglas Knott &lt;dknott@lkglaw.net&gt;, "Russart, Michael P" &lt;mrussart@hinshawlaw.com&gt;

Cc: Aisha Davis &lt;aisha@loevy.com&gt;, Scott Rauscher &lt;scott@loevy.com&gt;, "Kugler, Mollie T." &lt;MKugler@hinshawlaw.com&gt;, Randy Arnold &lt;ramold@lkglaw.net&gt;, Cory Brewer &lt;cbrewer@lkglaw.net&gt;

Counsel:

We can confirm that Ms. There's deposition can proceed on the afternoon of June 1. I have a doctor's appointment that morning that I cannot reschedule. If the afternoon of June 1 does not work, let us know and we will find another date. Thanks.

Tess

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**Terry v. County of Milwaukee**

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**Douglas Knott <dknott@lkglaw.net>**

Wed, May 23, 2018 at 8:18 PM

To: Theresa Kleinhaus &lt;tess@loevy.com&gt;, "Russart, Michael P" &lt;mrussart@hinshawlaw.com&gt;

Cc: Aisha Davis &lt;aisha@loevy.com&gt;, Scott Rauscher &lt;scott@loevy.com&gt;, "Kugler, Mollie T."

&lt;MKugler@hinshawlaw.com&gt;, Randy Arnold &lt;ramold@lkglaw.net&gt;, Cory Brewer &lt;cbrewer@lkglaw.net&gt;

We cannot commit to completing the deposition in less than the time permitted by the rules, but agree we should commence 6/1. Where will your client be produced?

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**From:** Theresa Kleinhaus [mailto:[tess@loevy.com](mailto:tess@loevy.com)]**Sent:** May 23, 2018 5:01 PM**To:** Douglas Knott <dknott@lkglaw.net>; Russart, Michael P <mrussart@hinshawlaw.com>**Case 2:17-cv-01112-JPS Filed 06/20/18 Page 4 of 11 Document 132-3**

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**Terry v. County of Milwaukee**

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**Theresa Kleinhaus** <tess@loevy.com>

Wed, May 23, 2018 at 10:04 PM

To: Douglas Knott &lt;dknott@lkglaw.net&gt;

Cc: "Russart, Michael P" &lt;mrussart@hinshawlaw.com&gt;, Aisha Davis &lt;aisha@loevy.com&gt;, Scott Rauscher &lt;scott@loevy.com&gt;, "Kugler, Mollie T." &lt;MKugler@hinshawlaw.com&gt;, Randy Arnold &lt;ramold@lkglaw.net&gt;, Cory Brewer &lt;cbrewer@lkglaw.net&gt;

We are only producing her once. So we can do June 1 and start at noon and go up to the full seven hours. Or you can propose an alternative date.

We have no preference as to location.

Thanks.

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Theresa Kleinhaus <tess@loevy.com>

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## Terry v. County of Milwaukee

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Theresa Kleinhaus <tess@loevy.com>

Mon, May 28, 2018 at 11:23 AM

To: Douglas Knott <dknott@lkglaw.net>

Cc: "Russart, Michael P" <mrussart@hinshawlaw.com>, Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Randy Arnold <rarnold@lkglaw.net>, Cory Brewer <cbrewer@lkglaw.net>

Doug,  
Please let me know whether you intend to go forward on Friday.  
Thanks,  
Tess  
[Quoted text hidden]

**Cc:** Aisha Davis <[aisha@loevy.com](mailto:aisha@loevy.com)>; Scott Rauscher <[scott@loevy.com](mailto:scott@loevy.com)>; Kugler, Mollie T. <[MKugler@hinshawlaw.com](mailto:MKugler@hinshawlaw.com)>; Randy Arnold <[rarnold@lkglaw.net](mailto:rarnold@lkglaw.net)>; Cory Brewer <[cbrewer@lkglaw.net](mailto:cbrewer@lkglaw.net)>

**Subject:** Terry v. County of Milwaukee

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**Terry v. County of Milwaukee**

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**Douglas Knott <dknott@lkglaw.net>**

Mon, May 28, 2018 at 12:35 PM

To: Theresa Kleinhaus &lt;tess@loevy.com&gt;

Cc: "Russart, Michael P" &lt;mrussart@hinshawlaw.com&gt;, Aisha Davis &lt;aisha@loevy.com&gt;, Scott Rauscher &lt;scott@loevy.com&gt;, "Kugler, Mollie T." &lt;MKugler@hinshawlaw.com&gt;, Randy Arnold &lt;ranold@lkglaw.net&gt;, Cory Brewer &lt;cbrewer@lkglaw.net&gt;

We will go forward with the deposition on 6/1. Can you produce her in Milwaukee at noon?

**Douglas S. Knott****Leib Knott Gaynor LLC****219 N. Milwaukee Street, Suite 710****Milwaukee, WI 53202****[www.lkglaw.net](http://www.lkglaw.net)****Direct: 414-276-2109****Cell: 414-416-9095****Fax: 414-276-2140**

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**From:** Theresa Kleinhaus [mailto:[tess@loevy.com](mailto:tess@loevy.com)]**Sent:** May 28, 2018 11:24 AM**To:** Douglas Knott <dknott@lkglaw.net>**Case 2:17-cv-01112-JPS Filed 06/20/18 Page 8 of 11 Document 132-3**



**Cc:** Russart, Michael P <[mrussart@hinshawlaw.com](mailto:mrussart@hinshawlaw.com)>; Aisha Davis <[aisha@loevy.com](mailto:aisha@loevy.com)>; Scott Rauscher <[scott@loevy.com](mailto:scott@loevy.com)>; Kugler, Mollie T. <[MKugler@hinshawlaw.com](mailto:MKugler@hinshawlaw.com)>; Randy Arnold <[rarnold@lkglaw.net](mailto:rarnold@lkglaw.net)>; Cory Brewer <[cbrewer@lkglaw.net](mailto:cbrewer@lkglaw.net)>  
**Subject:** Re: Terry v. County of Milwaukee

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Thanks,

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<[MKugler@hinshawlaw.com](mailto:MKugler@hinshawlaw.com)>; Randy Arnold <[rarnold@lkglaw.net](mailto:rarnold@lkglaw.net)>; Cory Brewer

<[cbrewer@lkglaw.net](mailto:cbrewer@lkglaw.net)>

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Mon, May 28, 2018 at 7:34 PM

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Yes

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